

EXHIBIT 6

FILED UNDER SEAL

Ex. C –Infringement Contention Chart: U.S. Patent No. 10,469,966
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Claim 1	Accused Instrumentalities
[1.0] A computing device comprising:	<p>Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.”¹ These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. <i>See, e.g.,</i> https://store.google.com/us/product/google_home_max?hl=en-US; https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US; https://www.google.com/chromecast/built-in/audio/.</p> <p>To facilitate this functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer device, which causes the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en. In addition, there are many other Cast-enabled Android, iOS, Chrome, or browser-based apps that allow a user to “cast” to a previously-created “speaker group” (and thereby cause the “speaker group” to be launched) using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts app, etc.) as well as certain third-party Cast-enabled apps (e.g., the Spotify app), accessed via an app store or Chromecast-enabled site URL. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, Chrome apps, or browser-based apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5, Pixel 5a (5G), Pixel 6 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer devices. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with the Google Home app, either alone or together with one or more of these other Cast-enabled apps, will be referred to as a “Cast-enabled computing device.”</p>

¹ Additional information regarding the accused instrumentalities is set forth in the Infringement Contention Chart for U.S. Patent No. 10,848,885 (Ex. D), which is incorporated herein by reference.

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	<p>As set out in the Supplemental Infringement Contentions, Sonos has endeavored to list the possible third-party smartphone, tablet, and computer devices that may have been used to download and install the Google Home app between November 2019 to present. <i>See</i> Appx. 1. Each of these third-party smartphone, tablet, and computer devices, when installed with the Google Home app, meets all elements of the claims as explained in more detail herein. As set forth below, Sonos cites representative examples of Google smartphone, tablet, and computer devices meeting elements 1.1, 1.2, and 1.3, but notes that the hardware aspects recited in elements 1.1, 1.2, and 1.3 have become ubiquitous among all smartphone, tablet, and computer devices. Each possible third-party smartphone, tablet, and computer device listed in Appendix 1 contains these aspects and thus meets elements 1.1, 1.2, and 1.3.</p> <p>Certain of the aforementioned Cast-enabled media players also include a display screen and software that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the software installed on these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail below, each Cast-enabled computing device comprises a “computing device” as recited in claim 1. Further, because each Cast-enabled media player is a data network device (<i>i.e.</i>, a device that is configured to connect to and communicate over a medium that interconnects devices in a manner that enables them to send digital data packets to and receive digital data packets from each other) and is configured to process and output audio, each Cast-enabled media player comprises a “zone player” as recited in claim 1. <i>See, e.g.,</i></p> <p align="right">https://support.google.com/googlenest/answer/7072284?hl=en;</p> <p>https://support.google.com/chromecast/answer/3046409?hl=en;</p> <p>https://store.google.com/us/product/nest_wifi_specs?hl=en-US.</p>

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[1.1] one or more processors;	Each Cast-enabled computing device comprises one or more processors. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel ; https://store.google.com/us/product/google_pixelbook_specs ; https://store.google.com/us/product/pixel_slate_specs .
[1.2] a non-transitory computer-readable medium;	Each Cast-enabled computing device comprises a non-transitory computer-readable medium. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel ; https://store.google.com/us/product/google_pixelbook_specs ; https://store.google.com/us/product/pixel_slate_specs .
[1.3] and program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the computing device to perform functions comprising:	Each Cast-enabled computing device comprises program instructions stored on the non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to perform the functions identified below. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel ; https://store.google.com/us/product/google_pixelbook_specs ; https://store.google.com/us/product/pixel_slate_specs .
[1.4] while serving as a controller for a networked media playback system comprising a first zone player and at least two other zone players, wherein the first zone player is operating in a standalone mode in	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to, while serving as a controller for a Cast-enabled playback system comprising a first Cast-enabled media player and at least two other Cast-enabled media players, where the first Cast-enabled media player is operating in a standalone mode in which the first Cast-enabled media player is configured to play back media individually, perform the functions identified below. For instance, each Cast-enabled computing device is programmed with the capability to serve as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, where at least the first Cast-enabled media player is operating in a standalone mode in

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<p>which the first zone player is configured to play back media individually:</p>	<p>which the first Cast-enabled media player is configured to play back audio individually rather than a group mode in which the first Cast-enabled media player is configured to play back audio as part of a group of Cast-enabled media players. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3Ddesktop&oco=1.</p> <p><u>Further, as described in detail below, each Cast-enabled computing device is programmed with the capability to perform each of the functions required by limitations 1.6-1.10 while serving a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players.</u></p> <p><u>Based on Sonos’s testing and evaluation,</u> <u>while describing one of its alleged “non-infringing alternatives” (NIAs) in its First Supplemental Response to Interrogatory No. 18 served on November 21, 2022, which Google refers to as “Non-Infringing Alternative #2 –</u> <u>Google stated as follows:</u></p> <p><u>See Google’s Eighth Suppl. Resp. to Sonos’s First Set of Interrogatories at 8-10. Thus,</u> <u>this</u> <u>described in its First Supplemental Response to Interrogatory No. 18. Google describes</u> <u>NIA as follows:</u></p>

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	<p><u>All asserted claims of the '885 and '966 patents require the</u></p> <p><u>For example, in claim 1 of the '966 patent, that claim requires that a “first zone player is operating in a standalone mode,” and that after a “first request,” a “second request,” and a “third request,” that “based on the third request, causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players.” Accordingly, the '966 patent claims, which each require these same steps, are subject to the alternative.</u></p>

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	<p><u>Id.</u> Thus, Google appears to be relying on this alleged functionality as a basis for non-infringement of certain functional limitations of Asserted Claim 1 of the '966 Patent, including limitations 1.7-1.11.</p> <p>Despite Google's suggestions that it is in the process of updating the functionality of its products in accordance with the NIA described in its First Supplemental Response to Interrogatory No. 18,</p> <p>NIA, nor has Google provided sufficient discovery on the so-called that allegedly implements the NIA described in Google's First Supplemental Response to Interrogatory No. 18.</p> <p>Nevertheless, even assuming <i>arguendo</i> that NIA described in its First Supplemental Response to Interrogatory No. 18, each Cast-enabled computing device would still meet each and every limitation of Asserted Claim 1 of the '966 Patent.</p> <p>As indicated above, Google is contending that the NIA avoids infringement of the claims of the '966 Patent</p> <p>the express language of claim limitation 1.8 of Asserted Claim 1 of the '885 Patent, which recites “after receiving the first and second indications” that the first zone player has been added to first and second zone scenes, the first zone player “continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation.” See Google's Eighth Suppl. Resp. to Sonos's</p>

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	<p><u>First Set of Interrogatories at 8-9:</u></p> <p><u>However, unlike claim 1 of the '885 Patent, the asserted claims of the '966 Patent do <i>not</i> require the first zone player “continuing to operate in the standalone mode” “after receiving the first and second indications” that the first zone player has been added to first and second zone scenes, respectively. Instead, with respect to the “first zone player” operating in “standalone mode,” independent claim 1 of the '966 Patent recites the following:</u></p> <p><u>[1.4] while serving as a controller for a networked media playback system comprising a first zone player and at least two other zone players, wherein the first zone player is operating in a <i>standalone mode</i> in which the first zone player is configured to play back media individually:</u></p> <p><u>[1.5] receiving a first request to create a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked;</u></p> <p><u>[1.6] based on the first request, i) causing creation of the first zone scene, ii) causing an indication of the first zone scene to be transmitted to the first zone player, and iii) causing storage of the first zone scene;</u></p> <p><u>[1.7] receiving a second request to create a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the third zone player is different than the second zone player;</u></p> <p><u>[1.8] based on the second request, i) causing creation of the second zone scene, ii) causing an indication of the second zone scene to be transmitted to the first zone player, and iii) causing storage of the second zone scene;</u></p> <p><u>[1.9] displaying a representation of the first zone scene and a representation of the second zone scene; and</u></p> <p><u>[1.10] displaying the representation of the first zone scene and the representation of the second zone scene, receiving a third request to invoke the first zone scene; and</u></p>

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	<p><u>[1.11] based on the third request, causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</u></p> <p><u>Thus, limitations 1.5-1.10 of claim 1 of the '966 Patent can be met by a "computing device" that is capable of performing each respective function of claim limitations 1.5-1.10 at a time when the "first zone player" is operating in "standalone mode," regardless of whether the "first zone player" continues to operate in "standalone mode" during the time in-between when any two of the respective functions recited in claim limitations 1.5-1.10 are performed. Indeed, neither claim limitation 1.4 nor claim limitation 1.11 nor any other limitation of claim 1 of the '966 Patent requires the "first zone player" to operate in "standalone mode" continuously while all of claim limitations 1.5-1.10/9.2-9.7 are performed by the "computing device." Rather, with respect to the "standalone mode" requirement, the "computing device" need only be capable of (i) performing each respective function of claim limitations 1.5-1.10 at a time when a "first zone player" is operating in "standalone mode" and then (ii) performing the function of claim limitation 1.11, which recites, among other things, "causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players."</u></p> <p><u>Applying this proper interpretation of</u> <u>claim 1 (and the other asserted</u> <u>claims) of the '966 Patent, Google's</u> <u>functionality does not avoid infringement, because</u> <u>as explained in further detail below,</u></p> <p><u>claim limitation 1.11, which recites, among other things, "causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players."</u></p> <p><u>Sonos further incorporates by reference the Opening Expert Report of Dr. Kevin C. Almeroth, which includes a further discussion of Google's</u> <u>NIA.</u></p>
[1.5] receiving a first request to create a first zone	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to receive a first request to create a

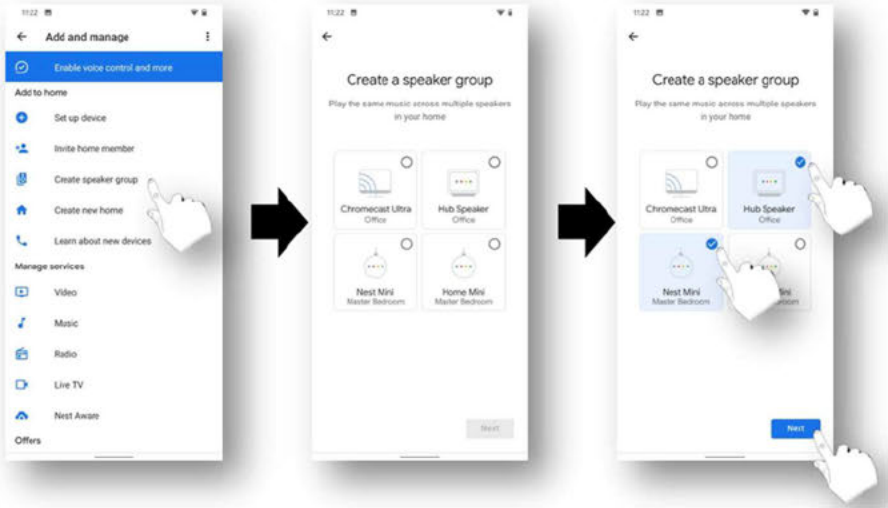
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<p>scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked;</p>	<p>first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to receive a request from a user to create a first “speaker group” that includes the first Cast-enabled media player and a second Cast-enabled media player in the Cast-enabled playback system that are to be configured for synchronous playback of audio when the first “speaker group” is invoked. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups” for “synchronous music throughout the home”). Thus, this first “speaker group” that a user seeks to create with this first request amounts to the claimed “first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked” because it is a previously-saved group of Cast-enabled players that has been predefined to include the first Cast-enabled media player and a second Cast-enabled media player and that is capable of existing in two states – an uninvoked state in which each Cast-enabled player in the previously-saved group is configured for individual playback of audio and an invoked state in which the Cast-enabled players in the previously-saved group are configured for synchronous playback of audio. <i>Id.</i></p> <p>Moreover, even if the Court were to construe the term “zone scene” to mean “a previously-saved group of zone players <i>according to a common theme</i>,” as Judge Alan Albright suggested during the Markman hearing in 20-cv-881-ADA (<i>see</i> D.I. 106 at 38:1-3), this first “speaker group” that a user seeks to create with this first request amounts to a first “zone scene” under that construction. Indeed, every “speaker group” that a user seeks to create in a Cast-enabled playback system is a previously-saved, predefined group of Cast-enabled players that is capable of existing in two states – an uninvoked state in which each Cast-enabled player in the previously-saved group is configured for individual playback of audio and an invoked state in which the Cast-enabled players in the previously-saved group are configured for synchronous playback of audio. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups” for “synchronous music throughout the home”). Further, every “speaker group” that a user seeks to create in a Cast-enabled playback system has some common theme, which</p>

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	<p>in this context amounts to whatever common topic, subject, etc. led the user to decide that these particular Cast-enabled media players should be placed into a previously-saved group that allows for synchronous playback when invoked. <i>Id</i>; <i>see also</i>, e.g., '966 Patent at 2:38-45 ("According to one aspect of the present invention, a mechanism is provided to allow a user to group some of the players according to a theme or scene, where each of the players is located in a zone. When the scene is activated, the players in the scene react in a synchronized manner. For example, the players in the scene are all caused to play an audio source or music in a playlist, wherein the audio source may be located anywhere on a network."), 3:52-56 ("FIG. 3A provides an illustration of one zone scene, where the left column shows the starting zone grouping--all zones are separate, the column on the right shows the effects of grouping the zones to make a group of 3 zones named after 'Morning'"); 8:57-61 (same); 10:37-42 ("The process 600 then moves to 604 where it allows a user to decide which zone players to be associated with the scene. For example, there are ten players in a household, and the scene is named after 'Morning'. The user may be given an interface to select four of the ten players to be associated with the scene."), FIG. 5A; D.I. 106 [Markman Hr. Tr.] at 30:24-31:5 (Google's counsel arguing "the theme would be, for example, grouping three areas as a morning scene or a morning theme because you get up in the morning and these are the three areas you want to have music in. You could do the same thing -- and the patent provides examples -- for other types of zone scenes for different times of day or different types of events"); American Heritage Dictionary of the English Language, Fifth Edition (2011), <i>available at</i> https://www.thefreedictionary.com/theme (defining "theme" as "[a] topic of discourse or discussion."); Collins English Dictionary – Complete and Unabridged, 12th Edition (2014), <i>available at</i>, https://www.thefreedictionary.com/theme (defining "theme" as "an idea or topic expanded in a discourse, discussion, etc"); https://www.learnersdictionary.com/definition/theme (defining "theme" as "the particular subject or idea on which the style of something (such as a party or room) is based"); https://dictionary.cambridge.org/us/dictionary/english/theme (defining "theme" as "the main subject of a talk, book, movie, etc."). Typically, this common theme will be a specific area (or set of areas) within the user's listening environment in which the user desires to listen to audio in synchrony across multiple Cast-enabled media players, although Google's "Cast" technology provides a user with the flexibility to create a previously-saved group of Cast-enabled media players according to any common topic or subject that is of interest to the user. As part of the user workflow for creating a "speaker group," a Cast-enabled computing device also prompts the user to input a name for the "speaker group," which serves as the user's shorthand label of the common theme that led to the user's request to create the previously-saved group of Cast-enabled media players and thereby allows the user to locate and select that previously-saved group later when the user wishes</p>

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	<p>to invoke it for synchronous playback. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to create a first “speaker group” that includes the “Nest Mini” as the first zone player and “Hub Speaker” as the second zone player:</p> 

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	<div data-bbox="892 240 1522 743" data-label="Image"> </div> <p>As shown in these screenshots, the user has assigned this “speaker group” a name of “Upstairs,” which serves as the user’s shorthand label for the common theme that led to the user’s request to create this previously-saved group of Cast-enabled media players – namely, that the “Nest Mini” and “Hub Speaker” players are both located in an area (or set of areas) within the user’s listening environment that the user considers to be the upstairs of the listening environment and the user has a desire to listen to audio in synchrony across those specific Cast-enabled media players at some point in the future.</p> <p>Representative excerpts of Google’s source code related² to the aforementioned functionality include:</p>

Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. *See* Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.

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	<p><u>implemented.</u></p> <p align="right"><u>NIA would avoid</u></p> <p><u>limitation 1.5.</u></p>
<p>[1.6] based on the first request, i) causing creation of the first zone scene, ii) causing an indication of the first zone scene to be transmitted to the first zone player, and iii) causing storage of the first zone scene;</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, based on the first request, (i) cause creation of the first zone scene, (ii) cause an indication of the first zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the first zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to receive a request from a user to create a first “speaker group” including the first Cast-enabled media player and a second Cast-enabled media player in the Cast-enabled playback system, and then based on the request,</p> <p>Thus, based on the request, the Cast-enabled computing device (i) causes creation of the first “speaker group,” (ii) causes an indication of the first “speaker group” to be transmitted to the first Cast-enabled media player, and (iii) causes storage of the first “speaker group.” <i>See e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”);</p>

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	<p data-bbox="489 922 1806 987">This first “speaker group” amounts to the claimed first “zone scene” for the reasons explained above in connection with limitation 1.5.</p> <div data-bbox="489 1174 1906 1328"><div></div><div></div><div></div><div></div></div>

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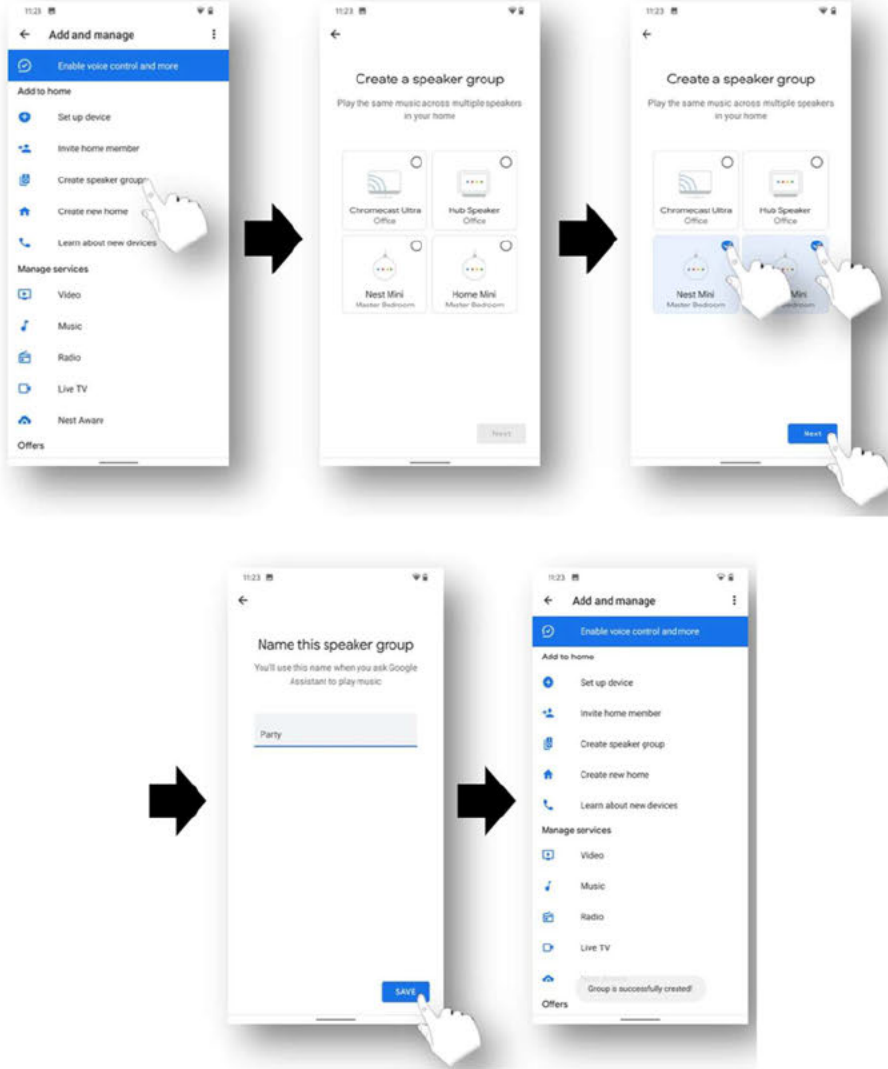
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	<div style="text-align: center;"> <ul style="list-style-type: none"> ▪ • ▪ • </div> <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p> <p><u>As explained above,</u></p> <p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 1.6 of claim 1 of the '966 Patent. Indeed, even if this functionality were implemented, each Cast-enabled computing device</u></p> <p><u>NIA would avoid limitation 1.6.</u></p>
[1.7] receiving a second request to create a second zone scene comprising a second predefined grouping of zone players including at least the first zone	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to receive a second request to create a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the second zone scene is invoked, where the third Cast-enabled media player is different than the second Cast-enabled media player.

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Claim 1	Accused Instrumentalities
<p>player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the third zone player is different than the second zone player;</p>	<p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is configured to receive a request from a user to create a second “speaker group” that includes the first Cast-enabled media player and a third Cast-enabled media player in the Cast-enabled playback system that are to be configured for synchronous playback of audio when the second “speaker group” is invoked. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups” for “synchronous music throughout the home”); claim limitation 1.5. Thus, this second “speaker group” that a user seeks to create with this second request amounts to the claimed “second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked” because it is a previously-saved group of Cast-enabled players that has been predefined to include the first Cast-enabled media player and a third Cast-enabled media player and that is capable of existing in two states – an uninvoked state in which each Cast-enabled player in the previously-saved group is configured for individual playback of audio and an invoked state in which the Cast-enabled players in the previously-saved group are configured for synchronous playback of audio. <i>Id.</i></p> <p>Moreover, even if the Court were to construe the term “zone scene” to mean “a previously-saved group of zone players <i>according to a common theme</i>,” as Judge Alan Albright suggested during the Markman hearing in 20-cv-881-ADA (<i>see</i> D.I. 106 at 38:1-3), this second “speaker group” that a user seeks to create with this second request amounts to a second “zone scene” under that construction for the same reasons explained above in connection with limitation 1.5.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to create a second “speaker group” that includes the “Nest Mini” as the first zone player and “Home Mini” as the third zone player:</p>

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Claim 1	Accused Instrumentalities
	 <p>As shown in these screenshots, the user has assigned this “speaker group” a name of “Party,” which serves as the user’s shorthand label for the common theme that led to the user’s request to create this previously-saved</p>

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Claim 1	Accused Instrumentalities
	<p>group of Cast-enabled media players – namely, that the “Nest Mini” and “Home Mini” players are located in an area (or set of areas) within the user’s listening environment that the user associates with having a party and the user has a desire to listen to audio in synchrony across those specific Cast-enabled media players at some point in the future.</p> <p>Representative excerpts of Google’s source code related to the aforementioned functionality include the source code</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p> <p><u>As explained above,</u> <u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 1.7 of claim 1 of the ’966 Patent.</u></p> <p><u>For example, after the first “speaker group” is launched automatically and the first Cast-enabled media player begins operating in accordance with the first “speaker group,” the Cast-enabled computing device can be used to cause the first Cast-enabled media player to stop operating in accordance with the first “speaker group” and to resume operating in standalone mode prior to the Cast-enabled computing device receiving such a second request (e.g., by tapping the “Stop” button for the first “speaker group” that is presented by the GUI for the Google Home app’s Media tab or the “Stop Casting” button for the first “speaker group” that is presented by the GUI for the YouTube Music app and then optionally initiating an individual</u></p>

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Claim 1	Accused Instrumentalities
<p>[1.8] based on the second request, i) causing creation of the second zone scene, ii) causing an indication of the second zone scene to be transmitted to the first zone player, and iii) causing storage of the second zone scene;</p>	<p>Cast session on the first Cast-enabled media player via the GUI for the Google Home app’s Media tab or the GUI for the YouTube Music app).</p> <p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, based on the second request, (i) cause creation of the second zone scene, (ii) cause an indication of the second zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the second zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-enabled media players, the Cast-enabled computing device is operable to receive a request from a user to create a second “speaker group” including the first Cast-enabled media player and a third Cast-enabled media player in the Cast-enabled playback system, and then based on the request,</p> <p align="right"><i>See e.g.,</i></p> <p>https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); claim limitation 1.6.</p> <p>This second “speaker group” amounts to the claimed second “zone scene” for the reasons explained above in connection with limitation 1.7.</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>

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Claim 1	Accused Instrumentalities
	<p><u>As explained above,</u> <u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 1.8 of claim 1 of the '966 Patent.</u></p> <p><u>For example, after the first “speaker group” is launched automatically and the first Cast-enabled media player begins operating in accordance with the first “speaker group,” the Cast-enabled computing device can be used to cause the first Cast-enabled media player to stop operating in accordance with the first “speaker group” and to resume operating in standalone mode prior to the Cast-enabled computing device performing the foregoing functionality for a second “speaker group” that includes the first Cast-enabled media player (e.g., by tapping the “Stop” button for the first “speaker group” that is presented by the GUI for the Google Home app’s Media tab or the “Stop Casting” button for the first “speaker group” that is presented by the GUI for the YouTube Music app and then optionally initiating an individual Cast session on the first Cast-enabled media player via the GUI for the Google Home app’s Media tab or the GUI for the YouTube Music app).</u></p>
<p>[1.9] displaying a representation of the first zone scene and a representation of the second zone scene; and</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to display a representation of the first zone scene and a representation of the second zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while serving as a controller for a Cast-enabled playback system that includes a first Cast-enabled media player and at least two other Cast-</p>

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Claim 1	Accused Instrumentalities
	<p>enabled media players, the Cast-enabled computing device is operable to display (i) a representation of a first “speaker group” (which is the claimed “first zone scene”) including the first Cast-enabled media player and a second Cast-enabled media player in the Cast-enabled playback system, and (ii) a representation of a second “speaker group” (which is the claimed “second zone scene”) including the first Cast-enabled media player and a third Cast-enabled media player. <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing device displaying a graphical user interface (GUI) of the Google Home app that comprises (i) a representation of a first “speaker group” named “Upstairs” that includes the “Nest Mini” and “Hub Speaker” players (which is the claimed “first zone scene” that includes the “first zone player” and “second zone player”), and (ii) a representation of a second “speaker group” named “Party” that includes the “Nest Mini” and “Home Mini” players (which is the claimed “second zone scene” that includes the “first zone player” and “third zone player”):</p>

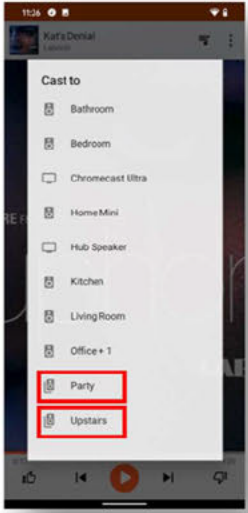
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Claim 1	Accused Instrumentalities
	<div data-bbox="909 237 1486 743" data-label="Image"> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google's YouTube Music app, which show the Cast-enabled computing device displaying a GUI of the YouTube Music app that comprises (i) a representation of a first "speaker group" named "Upstairs" (which is the claimed "first zone scene"), and (ii) a representation of a second "speaker group" named "Party" (which is claimed "second zone scene"):</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="1079 233 1325 743" data-label="Image"> </div> <p data-bbox="489 784 1919 1003">Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google's Google Play Music app, which show the Cast-enabled computing device displaying a GUI of the Google Play Music app that comprises (i) a representation of a first "speaker group" named "Upstairs" (which is the claimed "first zone scene"), and (ii) a representation of a second "speaker group" named "Party" (which is claimed "second zone scene"):</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="1079 233 1325 743"></div> <p data-bbox="489 784 1812 820">Various other Cast-enabled apps (e.g., Google Podcasts and Spotify apps) provide similar functionality.</p>

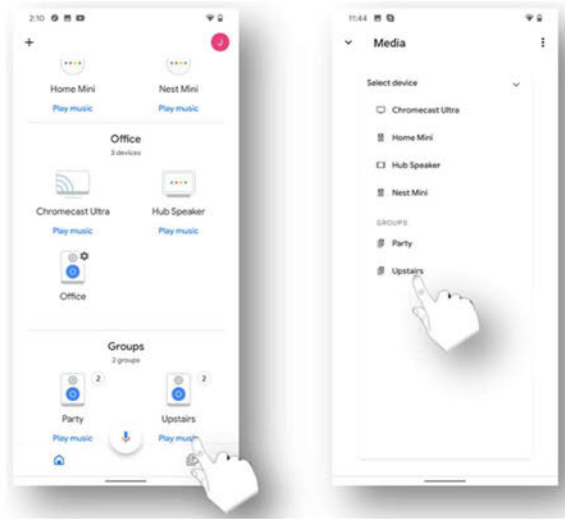
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Claim 1	Accused Instrumentalities
	<ul style="list-style-type: none"> • • <ul style="list-style-type: none"> ▪ • ▪ • <ul style="list-style-type: none"> ▪ • • <ul style="list-style-type: none"> ▪ • ▪ <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p> <p>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the</p>

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Claim 1	Accused Instrumentalities
	<p><u>conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 1.9 of claim 1 of the '966 Patent.</u></p> <p align="center">_____</p> <p><u>For example, after the second “speaker group” is launched automatically and the first Cast-enabled media player begins operating in accordance with the second “speaker group,” the Cast-enabled computing device can be used to cause the first Cast-enabled media player to stop operating in accordance with the second “speaker group” and to resume operating in standalone mode prior to the Cast-enabled computing device displaying the representations of the first and second “speaker groups” (e.g., by tapping the “Stop” button for the second “speaker group” that is presented by the GUI for the Google Home app’s Media tab or the “Stop Casting” button for the second “speaker group” that is presented by the GUI for the YouTube Music app and then optionally initiating an individual Cast session on the first Cast-enabled media player via the GUI for the Google Home app’s Media tab or the GUI for the YouTube Music app).</u></p>
<p>[1.10] while displaying the representation of the first zone scene and the representation of the second zone scene, receiving a third request to invoke the first zone scene; and</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to, while displaying the representation of the first zone scene and the representation of the second zone scene, receive a third request to invoke the first zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while displaying (i) a representation of a first “speaker group” including the first Cast-enabled media player and a second Cast-enabled media player (which is the claimed “first zone scene”), and (ii) a representation of a second “speaker group” including the first Cast-enabled media player and a third Cast-enabled media player (which is the claimed “second zone scene”), the Cast-enabled computing device is operable to receive a request from a user</p>

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Claim 1	Accused Instrumentalities
	<p>to launch the first “speaker group” for synchronous playback, which amounts to the claimed “third request to invoke the first zone scene.” <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to launch (and thus “invoke”) the “speaker pair” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Home app:</p>  <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing device receiving a request from a user to launch (and thus “invoke”)</p>

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Claim 1	Accused Instrumentalities
	<p>the “speaker pair” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the YouTube Music app:</p> <div data-bbox="1079 344 1325 854" data-label="Image"> </div> <p>Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s Google Play Music app, which show the Cast-enabled computing device receiving a request from a user to launch (and thus “invoke”) the “speaker pair” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Play Music app:</p>

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Claim 1	Accused Instrumentalities
	<div data-bbox="1079 233 1329 743" data-label="Image"> </div> <p data-bbox="489 784 1814 820">Various other Cast-enabled apps (e.g., Google Podcasts and Spotify apps) provide similar functionality.</p> <p data-bbox="489 857 1837 927">Representative excerpts of Google's source code for the Google Home app⁵ related to the aforementioned functionality include:</p>

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Claim 1	Accused Instrumentalities
	<p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p> <p><u>As explained above,</u> <u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 1.10 of claim 1 of the '966 Patent.</u></p> <p><u>For example, after the second "speaker group" is launched automatically and the first Cast-enabled media player begins operating in accordance with the second "speaker group," the Cast-enabled computing device can be used to cause the first Cast-enabled media player to stop operating in accordance with the second "speaker group" and to resume operating in standalone mode prior to the Cast-enabled computing device displaying the representations of the first and second "speaker groups" (e.g., by tapping the "Stop" button for the second "speaker group" that is presented by the GUI for the Google Home app's Media tab or the "Stop Casting" button for the second "speaker group" that is presented by the GUI for the YouTube Music app and then optionally initiating an individual Cast session on the first Cast-enabled media player via the GUI for the Google Home app's Media tab or the GUI for the YouTube Music app).</u></p>
[1.11] based on the third request, causing the first zone player to transition from operating in the	Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to, based on the third request, cause the first Cast-enabled media player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled

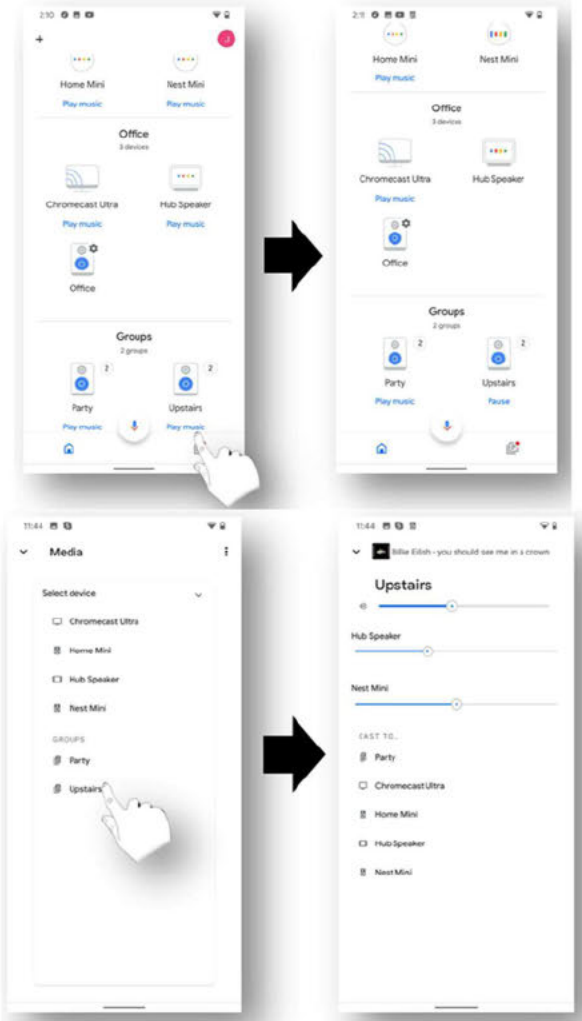
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Claim 1	Accused Instrumentalities
<p>standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	<p>media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player.</p> <p align="right"><i>See, e.g.,</i></p> <p>https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”);</p>

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Claim 1	Accused Instrumentalities
	<p>Two examples of this functionality are illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing device receiving a request from a user to launch the first “speaker group” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Home app and then that causes the “Nest Mini” and “Hub Speaker” players to transition from (i) operating in a standalone mode in which each of the “Nest Mini” and “Hub Speaker” players is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p>

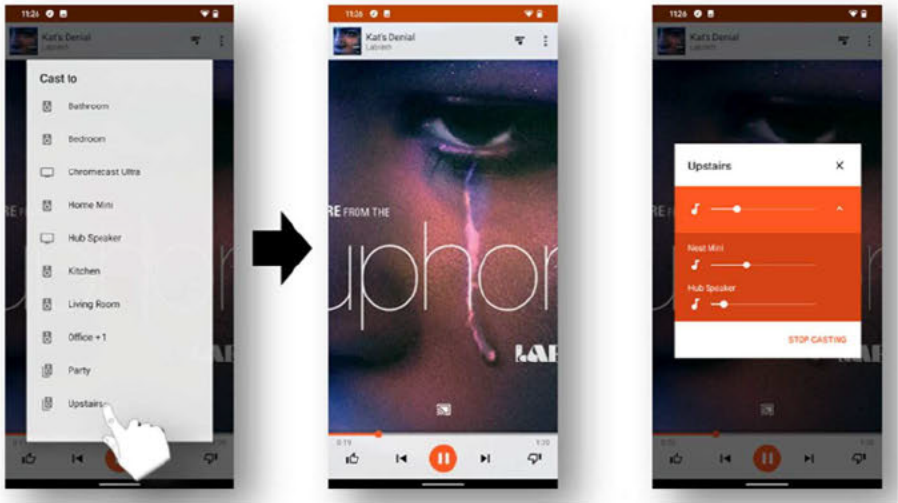
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Claim 1	Accused Instrumentalities
	 <p>The figure consists of four screenshots of a mobile application interface, arranged in a 2x2 grid with arrows indicating a sequence of actions. The top-left screenshot shows a home screen with sections for 'Home Mini', 'Nest Mini', 'Office' (3 devices), and 'Groups' (2 groups). A hand icon is shown tapping the 'Upstairs' group. The top-right screenshot shows the 'Office' group selected, displaying 'Chromecast Ultra' and 'Hub Speaker'. The bottom-left screenshot shows the 'Media' screen with a list of devices: 'Chromecast Ultra', 'Home Mini', 'Hub Speaker', and 'Nest Mini'. A hand icon is shown tapping 'Upstairs'. The bottom-right screenshot shows the 'Upstairs' media player interface with volume sliders for 'Hub Speaker' and 'Nest Mini'.</p> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google's YouTube Music app,</p>

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Claim 1	Accused Instrumentalities
	<p>which show the Cast-enabled computing device receiving a request from a user to launch the first “speaker group” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the YouTube Music app and then responsively causes the “Nest Mini” and “Hub Speaker” players to transition from (i) operating in a standalone mode in which each of the “Nest Mini” and “Hub Speaker” players is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p> <div data-bbox="751 527 1654 1036"> </div> <p>Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s Google Play Music app, which show the Cast-enabled computing device receiving a request from a user to launch the first “speaker group” named “Upstairs” (which is the claimed “first zone scene”) via the GUI of the Google Play Music app and then that causes the “Nest Mini” and “Hub Speaker” players to transition from (i) operating in a standalone mode in which each of the “Nest Mini” and “Hub Speaker” players is configured to play back audio individually to (ii) operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” such that the “Nest Mini” and “Hub Speaker” players are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 1	Accused Instrumentalities
	

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Claim 1	Accused Instrumentalities

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Claim 1	Accused Instrumentalities

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Claim 1	Accused Instrumentalities
	<div data-bbox="537 271 1123 708"> <ul style="list-style-type: none"> <ul style="list-style-type: none"> ■ ■ ● <ul style="list-style-type: none"> ■ ● ● <ul style="list-style-type: none"> ■ ● </div> <p data-bbox="487 794 1915 898">Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p> <p data-bbox="487 977 1915 1081"><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 1.11 of claim 1 of the ’966 Patent.</u></p>

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Claim 1	Accused Instrumentalities
	<p><u>(e.g., by tapping the “Stop” button for the second “speaker group” that is presented by the GUI for the Google Home app’s Media tab or the “Stop Casting” button for the second “speaker group” that is presented by the GUI for the YouTube Music app and then optionally initiating an individual Cast session on the first Cast-enabled media player via the GUI for the Google Home app’s Media tab or the GUI for the YouTube Music app).</u></p>

Claim 2	Accused Instrumentalities
<p>[2.0] The computing device of claim 1, further comprising program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the computing device to perform functions comprising:</p>	<p>As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, each Cast-enabled computing device comprises a non-transitory computer-readable medium including executable instructions that, when executed by the Cast-enabled computing device’s one or more processors, cause the Cast-enabled computing device to perform the functions identified below.</p>
<p>[2.1] while the first zone player is</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device’s non-transitory computer-readable medium that, when executed by the Cast-enabled computing</p>

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Claim 2	Accused Instrumentalities
<p>configured to coordinate with at least the second zone player to play back media in synchrony with at least the second zone scene; and</p>	<p>device's one or more processors, cause the Cast-enabled computing device to, while the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to play back media in synchrony with at least the second Cast-enabled media player, receiving a fourth request to invoke the second zone scene.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while the first Cast-enabled media player is operating in accordance with the previously-saved group defined by the first "speaker group" such that the first Cast-enabled media player is configured to coordinate with the second Cast-enabled media player to output audio in synchrony with the output of audio by the second Cast-enabled media player, the Cast-enabled computing device is operable to receive a request to launch the second "speaker group," which amounts to the claimed "fourth request to invoke the second zone scene." <i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/chromecast/answer/6178107?co=GENIE.Platform%3DAndroid&hl=en; https://support.google.com/googlenest/answer/7030379?co=GENIE.Platform%3DAndroid&hl=en-GB; https://support.google.com/googlenest/answer/7181830?hl=en-GB&ref_topic=7030084; https://support.google.com/chromecast/answer/3228332?hl=en-GB&ref_topic=4602553&co=GENIE.Platform%3DDesktop&oco=1.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device installed with the Google Home app, which show the Cast-enabled computing receiving a request from a user to launch (and thus "invoke") the second "speaker group" named "Party" (which is the claimed "second zone scene") via the GUI of the Google Home app while the "Nest Mini" (the claimed "first zone player") is configured to output audio in synchrony with the "Hub Speaker" (the claimed "second zone player") in accordance with the launched first "speaker group" named "Upstairs":</p>

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Claim 2	Accused Instrumentalities
	<div data-bbox="1050 256 1312 779" data-label="Image"> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing receiving a request from a user to launch (and thus “invoke”) the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the YouTube Music app while the “Nest Mini” (the claimed “first zone player”) is configured to output audio in synchrony with the “Hub Speaker” (the claimed “second zone player”) in accordance with the launched first “speaker group” named “Upstairs”:</p>

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Claim 2	Accused Instrumentalities
	<div data-bbox="1024 256 1312 779" data-label="Image"> </div> <p>Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device installed with not only the Google Home app, but also Google's Google Podcasts app, which show the Cast-enabled computing receiving a request from a user to launch (and thus "invoke") the second "speaker group" named "Party" (which is the claimed "second zone scene") via the GUI of the Google Podcasts app while the "Nest Mini" (the claimed "first zone player") is configured to output audio in synchrony with the "Hub Speaker" (the claimed "second zone player") in accordance with the launched first "speaker group" named "Upstairs":</p>

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Claim 2	Accused Instrumentalities
	<div data-bbox="1018 256 1312 779" data-label="Image"> </div> <p>Various other Cast-enabled apps (e.g., Google Play Music and Spotify apps) provide similar functionality.</p> <p>Representative excerpts of Google's source code related to the aforementioned functionality include the source code cited above in connection with claim limitation 1.10.</p> <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p> <p><u>While Google has not asserted otherwise, NIA described in its First Supplemental Response to Interrogatory No. 18 also does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 2.2 of claim 2 of the '966 Patent.</u></p>

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Claim 2	Accused Instrumentalities
<p>[2.2] based on the fourth request, causing the first zone player to (a) cease to operate in accordance with the first predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player and (b) begin to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of</p>	<p>Each Cast-enabled computing device comprises program instructions stored on the Cast-enabled computing device's non-transitory computer-readable medium that, when executed by the Cast-enabled computing device's one or more processors, cause the Cast-enabled computing device to, based on the fourth request, cause the first Cast-enabled media player to (a) cease to operate in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player and (b) begin to operate in accordance with the second predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player.</p> <p><i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (“Group any combination of Google Nest or Google Home speakers and displays and Chromecast devices together for synchronous music throughout the home.”); <i>see also</i> claim limitation 1.11.</p> <p>One example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with the Google Home app, which show the Cast-enabled computing device receiving a request from a user to launch the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the Google Home app and then</p>

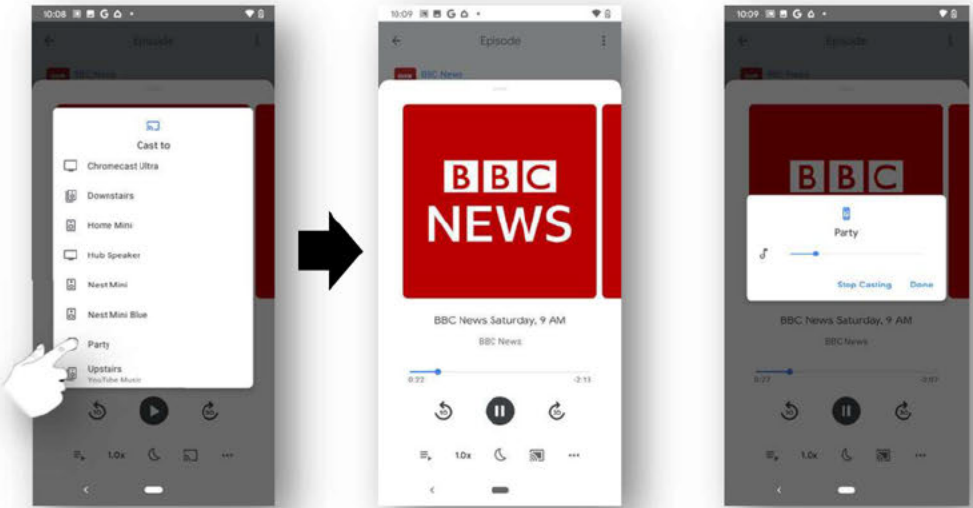
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Claim 2	Accused Instrumentalities
media by at least the third zone player.	<p>that causes the “Nest Mini” player (which is the claimed “first zone player”) to (a) cease operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” and (b) begin operating in accordance with the previously-saved group defined by the “Party” “speaker group” such that the “Nest Mini” player and the “Home Mini” player (the claimed “third zone player”) are configured to coordinate with one another to output audio in synchrony:</p> <div data-bbox="879 440 1470 940" data-label="Image"> <p>The image contains two side-by-side screenshots of a mobile application interface, likely Google Home, connected by a large black arrow pointing from left to right. Both screenshots show a top section with 'Hub Speaker' and 'Nest Mini Blue' options, each with a 'Play music' button and a settings icon. Below this is a 'Groups' section labeled '3 groups'. In the left screenshot, the 'Party' group is selected, showing 'Downstairs' (Play music), 'Party' (Play music), and 'Upstairs' (Pause). In the right screenshot, the 'Party' group is still selected, but its status is 'Pause', and the 'Upstairs' group's status is 'Play music'. A hand icon is shown interacting with the 'Party' group in the left screenshot.</p> </div> <p>Another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google’s YouTube Music app, which show the Cast-enabled computing device receiving a request from a user to launch the second “speaker group” named “Party” (which is the claimed “second zone scene”) via the GUI of the YouTube Music app and then</p> <p>that causes the “Nest Mini” player (which is the claimed “first zone player”) to (a) cease operating in accordance with the previously-saved group defined by the “Upstairs” “speaker group” and (b) begin operating in accordance with the previously-saved group defined by the “Party” “speaker group” such that the “Nest Mini” player and the “Home Mini” player (the claimed “third zone player”) are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 2	Accused Instrumentalities
	<div data-bbox="678 256 1640 760" data-label="Image"> </div> <p data-bbox="489 833 1896 1157">Yet another example of this functionality is illustrated by the following screenshots from an example Cast-enabled computing device that is installed with not only the Google Home app, but also Google's Google Podcasts app, which show the Cast-enabled computing device receiving a request from a user to launch the second "speaker group" named "Party" (which is the claimed "second zone scene") via the GUI of the Google Podcasts app and then that causes the "Nest Mini" player (which is the claimed "first zone player") to (a) cease operating in accordance with the previously-saved group defined by the "Upstairs" "speaker group" and (b) begin operating in accordance with the previously-saved group defined by the "Party" "speaker group" such that the "Nest Mini" player and the "Home Mini" player (the claimed "third zone player") are configured to coordinate with one another to output audio in synchrony:</p>

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Claim 2	Accused Instrumentalities
	 <p>Various other Cast-enabled apps (e.g., Google Play Music and Spotify apps) provide similar functionality.</p> <p>Representative excerpts of Google's source code related to the aforementioned functionality include the source code cited for claim limitation 1.11.</p> <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p> <p><u>While Google has not asserted otherwise,</u> <u>NIA described in its First Supplemental Response to Interrogatory No. 18 also does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 2.3 of claim 2 of the '966 Patent.</u></p>

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Claim 3	Accused Instrumentalities
<p>[3.0] The computing device of claim 1, [3.1] wherein causing storage of the first zone scene comprises causing storage of the first zone scene at a location other than the computing device, and</p>	<p>As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, as described above, each Cast-enabled computing device is programmed to cause storage of the first zone scene by causing storage of the first zone scene at a location other than the Cast-enabled computing device.</p> <p align="center"><i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); <i>see also</i> limitation 1.6.</p> <p>Notably,</p> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 13, including any of Google’s documents or source code cited therein. <i>See</i> Defendant’s Objections & Responses to Plaintiff’s First Set of Fact Discovery Interrogatories to Defendants.</p>

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Claim 3	Accused Instrumentalities
	<p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 3.1 of claim 3 of the '966 Patent for the same reasons discussed above in connection with limitation 1.6 of claim 1 of the '966 Patent.</u></p>
<p>[3.2] wherein causing storage of the second zone scene comprises causing storage of the second zone scene at the location other than the computing device.</p>	<p>As described above, each Cast-enabled computing device is programmed to cause storage of the second zone scene by causing storage of the second zone scene at the location other than the Cast-enabled computing device.</p> <p align="center"><i>See, e.g.,</i> https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en (providing instructions on how to create “speaker groups”); <i>see also</i> limitation 1.8.</p> <p>As noted above,</p>

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Claim 3	Accused Instrumentalities
	<p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 13, including any of Google's documents or source code cited therein. <i>See</i> Defendant's Objections & Responses to Plaintiff's First Set of Fact Discovery Interrogatories to Defendants.</p> <p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 3.2 of claim 3 of the '966 Patent for the same reasons discussed above in connection with limitation 1.8 of claim 1 of the '966 Patent.</u></p>

Claim 4	Accused Instrumentalities
[4.0] The computing device of claim 3, [4.1] wherein the location other than the computing device comprises a zone player of the first predefined grouping of zone players.	As described above, each Cast-enabled computing device comprises a "computing device," as recited in claim 3. Moreover, each Cast-enabled computing device is programmed to cause storage of the first and second zone scenes by causing storage of the first and second zone scenes at a Cast-enabled media player that is included in the previously-saved groups defined by the first and second zone scenes. <i>See</i> claim 3.

Claim 6	Accused Instrumentalities
[6.0] The computing device of claim 1, [6.1] wherein the first predefined	As described above, each Cast-enabled computing device comprises a "computing device," as recited in claim 1. Moreover, each Cast-enabled computing device is programmed such that, in enabling and causing creation of a first "speaker group" that includes a first Cast-enabled media player and a second Cast-enabled media player (which is the claimed "first zone scene" comprising the "first predefined grouping of zone players") and a second "speaker group" that includes the first Cast-enabled media player and a third Cast-enabled media

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Claim 6	Accused Instrumentalities
grouping of zone players does not include the third zone player, and [6.2] wherein the second predefined grouping of zone players does not include the second zone player.	<p>player (which is the claimed “second zone scene” comprising the “second predefined grouping of zone players”), the first “speaker group” need not include the third Cast-enabled media player (which is the claimed “third zone player”) and the second “speaker group” need not include the second Cast-enabled media player (which is the claimed “second zone player”). <i>See</i> claim limitations 1.5 and 1.7.</p> <p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitations 6.1-6.2 of claim 6 of the '966 Patent for the same reasons discussed above in connection with limitations 1.5 and 1.7 of claim 1 of the '966 Patent.</u></p>

Claim 8	Accused Instrumentalities
[8.0] The computing device of claim 1, [8.1] wherein receiving the first request comprises receiving a first set of one or more inputs via a user interface of the computing device,	<p>As described above, each Cast-enabled computing device comprises a “computing device,” as recited in claim 1. Moreover, as described above, each Cast-enabled computing device is programmed to receive a first request to create a first zone scene that takes the form of a first set of one or more inputs received via a user interface of the Cast-enabled computing device.</p> <p>For instance, as discussed and shown above in connection with claim limitation 1.5, each Cast-enabled computing device is programmed to receive a request from a user to create a first “speaker group” (which amounts to the claimed “first request to create a first zone scene”) that takes the form of a set of one or more inputs received via a GUI of the Google Home app running on the Cast-enabled computing device.</p> <p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 8.1 of claim 8 of the '966 Patent for the same reasons discussed above in connection with limitation 1.5 of claim 1 of the '966 Patent.</u></p>
[8.2] wherein receiving the	As described above, each Cast-enabled computing device is programmed to receive a second request to create a second zone scene that takes the form of a second set of one or more inputs received via the user interface.

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Claim 8	Accused Instrumentalities
second request comprises receiving a second set of one or more inputs via the user interface, and	<p>For instance, as discussed and shown above in connection with claim limitation 1.7, each Cast-enabled computing device is programmed to receive a request from a user to create a second “speaker group” (which amounts to the claimed “second request to create a second zone scene”) that takes the form of a set of one or more inputs received via the GUI of the Google Home app running on the Cast-enabled computing device.</p> <p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 8.2 of claim 8 of the '966 Patent for the same reasons discussed above in connection with limitation 1.7 of claim 1 of the '966 Patent.</u></p>
[8.3] wherein receiving the third request comprises receiving a third set of one or more inputs via the user interface.	<p>As described above, each Cast-enabled computing device is programmed to receive a third request to invoke the first zone scene that takes the form of a third set of one or more inputs received via the user interface.</p> <p>For instance, as discussed and shown above in connection with claim limitation 1.10, each Cast-enabled computing device is programmed to receive a request from a user to launch the first “speaker group” (which amounts to the claimed “third request to invoke the first zone scene”) that takes the form of a set of one or more inputs received via the GUI of the Google Home app running on the Cast-enabled computing device.</p> <p><u>NIA described in its First Supplemental Response to Interrogatory No. 18 does not alter the conclusion that each Cast-enabled computing device is programmed with the functional capability required by limitation 8.3 of claim 8 of the '966 Patent for the same reasons discussed above in connection with limitation 1.10 of claim 1 of the '966 Patent.</u></p>
Claim 9	Accused Instrumentalities
[9.0] A non-transitory computer-readable medium, wherein the non-transitory	<p>Google’s “Cast” technology enables Cast-enabled media players to be included in a “speaker group” “for synchronous music throughout the home.” These Cast-enabled media players include Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality.</p>

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Claim 9	Accused Instrumentalities
<p>computer-readable medium is provisioned with program instructions that are executable to cause a computing device to perform functions comprising:</p>	<p><i>See, e.g.,</i> https://store.google.com/us/product/google_home_max?hl=en-US; https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US; https://www.google.com/chromecast/built-in/audio/.</p> <p>To facilitate this functionality, the Google Home app allows a user to “[c]reate and manage speaker groups” from the user’s smartphone, tablet, or computer device, as well as to “cast” to a previously-created “speaker group” from the user’s smartphone, tablet, or computer device, which would cause the “speaker group” to be invoked. https://support.google.com/googlenest/answer/7174267?co=GENIE.Platform%3DAndroid&hl=en. In addition, there are many other Cast-enabled Android, iOS, Chrome, or browser-based apps that allow a user to “cast” to a previously-created “speaker group” (and thereby cause the “speaker group” to be launched) using the user’s smartphone, tablet, or computer device, including certain of Google’s own Cast-enabled apps (e.g., YouTube Music app, the Google Play Music app, the Google Podcasts app, etc.) as well as certain third-party Cast-enabled apps (e.g., the Spotify app), accessed via an app store or Chromecast-enabled site URL. The Google Home app, either alone or together with one or more of these other Cast-enabled apps, can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, Chrome, or browser-based apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (e.g., the Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5, Pixel 5a (5G), Pixel 6 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer device. <i>See, e.g.,</i> https://store.google.com/us/magazine/compare_pixel; https://store.google.com/us/product/google_pixelbook_specs; https://store.google.com/us/product/pixel_slate_specs. For purposes of this chart, any smartphone, tablet, or computer device installed with the Google Home app, either alone or together with one or more of these other Cast-enabled apps, will be referred to as a “Cast-enabled computing device.”</p> <p>As set out in the Supplemental Infringement Contentions, Sonos has endeavored to list the possible third-party smartphone, tablet, and computer devices that may have been used to download and install the Google Home app between November 2019 to present. <i>See</i> Appx. 1. Each of these third-party smartphone, tablet, and computer devices, when installed with the Google Home app, meets all elements of the claims as explained in more detail herein. As set forth below, Sonos cites representative examples of Google smartphone, tablet, and computer devices that comprises a tangible, non-transitory computer-readable storage medium that, when installed with the Google Home app, includes executable instructions that when executed by a processor causes the device to carry out the recited functions, but notes that a tangible, non-transitory computer-readable storage</p>

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Claim 9	Accused Instrumentalities
	<p>medium has become ubiquitous among all smartphone, tablet, and computer devices. Each possible third-party smartphone, tablet, and computer device listed in Appendix 1 contains this aspect and thus meets this element.</p> <p>Certain of the aforementioned Cast-enabled media players also include a display screen and software that enables these Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music; https://store.google.com/us/product/google_nest_hub_max?hl=en-US; https://support.google.com/googlenest/answer/9165738?hl=en-GB&ref_topic=7030084. Similar to the Cast-enabled apps installed on the Cast-enabled computing devices, the software installed on these Cast-enabled displays allows a user to “cast” to a previously-created “speaker group” using the Cast-enabled display’s user interface.</p> <p>As described in further detail, each Cast-enabled computing device is a “controller” that comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled computing device’s processor, cause the Cast-enabled computing device to perform the functions recited in claim 9. Further, each server that hosts the Google Home app for download onto Cast-enabled computing devices, which is referred to herein as a “Cast-enabled app download server,” comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device’s processor, cause the Cast-enabled computing device to perform the functions recited in claim 9. Further yet, because each Cast-enabled media player is a data network device (<i>i.e.</i>, a device that is configured to connect to and communicate over a medium that interconnects devices in a manner that enables them to send digital data packets to and receive digital data packets from each other) and is configured to process and output audio, each Cast-enabled media player comprises a “zone player” as recited in claim 9.</p> <p align="right">https://support.google.com/googlenest/answer/7072284?hl=en; https://support.google.com/chromecast/answer/3046409?hl=en; https://store.google.com/us/product/nest_wifi_specs?hl=en-US.</p>

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Claim 9	Accused Instrumentalities
<p>[9.1] while serving as a controller for a networked media playback system comprising a first zone player and at least two other zone players, wherein the first zone player is operating in a standalone mode in which the first zone player is configured to play back media individually:</p>	<p>Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, while serving as a controller for a Cast-enabled playback system comprising a first Cast-enabled media player and at least two other Cast-enabled media players, where the first Cast-enabled media player is operating in a standalone mode in which the first Cast-enabled media player is configured to play back media individually, perform the functions identified below. <i>See</i> claim limitation 1.4.</p>
<p>[9.2] receiving a first request to create a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked;</p>	<p>Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to receive a first request to create a first zone scene comprising a first predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a second Cast-enabled media player that are to be configured for synchronous playback of media when the first zone scene is invoked. <i>See</i> claim limitation 1.5.</p>
<p>[9.3] based on the first request, i)</p>	<p>Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled</p>

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Claim 9	Accused Instrumentalities
<p>causing creation of the first zone scene, ii) causing an indication of the first zone scene to be transmitted to the first zone player, and iii) causing storage of the first zone scene;</p>	<p>computing device's processor, cause the Cast-enabled computing device to, based on the first request, (i) cause creation of the first zone scene, (ii) cause an indication of the first zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the first zone scene. <i>See</i> claim limitation 1.6.</p>
<p>[9.4] receiving a second request to create a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the third zone player is different than the second zone player;</p>	<p>Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to receive a second request to create a second zone scene comprising a second predefined grouping of Cast-enabled media players including at least the first Cast-enabled media player and a third Cast-enabled media player that are to be configured for synchronous playback of media when the second zone scene is invoked, where the third Cast-enabled media player is different than the second Cast-enabled media player. <i>See</i> claim limitation 1.7.</p>

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Claim 9	Accused Instrumentalities
[9.5] based on the second request, i) causing creation of the second zone scene, ii) causing an indication of the second zone scene to be transmitted to the first zone player, and iii) causing storage of the second zone scene;	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, based on the second request, (i) cause creation of the second zone scene, (ii) cause an indication of the second zone scene to be transmitted to the first Cast-enabled media player, and (iii) cause storage of the second zone scene. <i>See</i> claim limitation 1.8.
[9.6] displaying a representation of the first zone scene and a representation of the second zone scene; and	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to display a representation of the first zone scene and a representation of the second zone scene. <i>See</i> claim limitation 1.9.
[9.7] while displaying the representation of the first zone scene and the representation of the second zone scene, receiving a third request to invoke the first zone scene; and	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, while displaying the representation of the first zone scene and the representation of the second zone scene, receive a third request to invoke the first zone scene. <i>See</i> claim limitation 1.10.
[9.8] based on the third request,	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled

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Claim 9	Accused Instrumentalities
<p>causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player.</p>	<p>computing device's processor, cause the Cast-enabled computing device to, based on the third request, cause the first Cast-enabled media player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at least the second Cast-enabled media player. <i>See</i> claim limitation 1.11.</p>
Claim 10	Accused Instrumentalities
<p>[10.0] The non-transitory computer-readable medium of claim 9, wherein the non-transitory computer-readable medium is also provisioned with program</p>	<p>As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by the Cast-enabled computing device, cause the Cast-enabled computing device to perform the functions identified below. <i>See</i> claim limitation 2.0.</p>

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Claim 10	Accused Instrumentalities
instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the computing device to perform functions comprising:	
[10.1] while the first zone player is configured to coordinate with at least the second zone player to play back media in synchrony with at least the second zone player, receiving a fourth request to invoke the second zone scene; and	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, while the first Cast-enabled media player is configured to coordinate with at least the second Cast-enabled media player to play back media in synchrony with at least the second Cast-enabled media player, receive a fourth request to invoke the second zone scene. <i>See</i> claim limitation 2.1.
[10.2] based on the fourth request, causing the first zone player to (a) cease to operate in accordance with the	Each Cast-enabled computing device and each Cast-enabled app download server comprises a non-transitory computer-readable medium provisioned with program instructions that, when executed by a Cast-enabled computing device's processor, cause the Cast-enabled computing device to, based on the fourth request, cause the first Cast-enabled media player to (a) cease to operate in accordance with the first predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is no longer configured to coordinate with at least the second Cast-enabled media player to output media in synchrony with output of media by at

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Claim 10	Accused Instrumentalities
<p>first predefined grouping of zone players such that the first zone player is no longer configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player and (b) begin to operate in accordance with the second predefined grouping of zone players such that the first zone player is configured to coordinate with at least the third zone player to output media in synchrony with output of media by at least the third zone player.</p>	<p>least the second Cast-enabled media player and (b) begin to operate in accordance with the second predefined grouping of Cast-enabled media players such that the first Cast-enabled media player is configured to coordinate with at least the third Cast-enabled media player to output media in synchrony with output of media by at least the third Cast-enabled media player. <i>See</i> claim limitation 2.2.</p>

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Claim 11	Accused Instrumentalities
[11.0] The non-transitory computer-readable medium of claim 9, [11.1] wherein causing storage of the first zone scene comprises causing storage of the first zone scene at a location other than the computing device, and	As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed to cause storage of the first zone scene by causing storage of the first zone scene at a location other than the Cast-enabled computing device. <i>See</i> claim limitation 3.1.
[11.2] wherein causing storage of the second zone scene comprises causing storage of the second zone scene at the location other than the computing device.	In accordance with the program instructions, each Cast-enabled computing device is programmed to cause storage of the second zone scene by causing storage of the second zone scene at the location other than the Cast-enabled computing device. <i>See</i> claim limitation 3.2.

Claim 12	Accused Instrumentalities
[12.0] The non-transitory computer-readable medium of claim 11, [12.1] wherein the location other than the computing	As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 11. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed to cause storage of the first and second zone scenes by causing storage of the first and second zone scenes at the first Cast-enabled media player that is included in the previously-saved groups defined by the first and second zone scenes. <i>See</i> claim 4.

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Claim 12	Accused Instrumentalities
device comprises a zone player of the first predefined grouping of zone players.	

Claim 14	Accused Instrumentalities
<p>[14.0] The non-transitory computer-readable medium of claim 9,</p> <p>[14.1] wherein the first predefined grouping of zone players does not include the third zone player, and</p> <p>[14.2] wherein the second predefined grouping of zone players does not include the second zone player.</p>	<p>As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed such that, in enabling and causing creation of a first “speaker group” that includes a first Cast-enabled media player and a second Cast-enabled media player (which is the claimed “first zone scene” comprising the “first predefined grouping of zone players”) and a second “speaker group” that includes the first Cast-enabled media player and a third Cast-enabled media player (which is the claimed “second zone scene” comprising the “second predefined grouping of zone players”), the first “speaker group” need not include the third Cast-enabled media player (which is the claimed “third zone player”) and the second “speaker group” need not include the second Cast-enabled media player (which is the claimed “second zone player”). <i>See</i> claim limitations 6.0-6.2.</p>

Claim 16	Accused Instrumentalities
<p>[16.0] The non-transitory computer-readable medium of claim 9,</p> <p>[16.1] wherein receiving the first</p>	<p>As described above, each Cast-enabled computing device and each Cast-enabled app download server comprises a “non-transitory computer-readable medium,” as recited in claim 9. Moreover, in accordance with the program instructions, each Cast-enabled computing device is programmed to receive a first request to create a first zone scene that takes the form of a first set of one or more inputs received via a user interface of the Cast-enabled computing device. <i>See</i> claim limitation 8.1.</p>

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Claim 16	Accused Instrumentalities
request comprises receiving a first set of one or more inputs via a user interface of the computing device,	
[16.2] wherein receiving the second request comprises receiving a second set of one or more inputs via the user interface, and	In accordance with the program instructions, each Cast-enabled computing device is programmed to receive a second request to create a second zone scene that takes the form of a second set of one or more inputs received via the user interface. <i>See</i> claim limitation 8.2.
[16.3] wherein receiving the third request comprises receiving a third set of one or more inputs via the user interface.	In accordance with the program instructions, each Cast-enabled computing device is programmed to receive a third request to invoke the first zone scene that takes the form of a third set of one or more inputs received via the user interface. <i>See</i> claim limitation 8.3.